



SWEENEY WINGATE & BARROW

July 10, 2025

Reply to: Main Office

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VIA E-MAIL: gergel_ecf@scd.uscourts.gov

Hon. Richard M. Gergel
District Judge
District of South Carolina

RE: Steven Grinnell, et al. v. Roehl Transport, Inc. and Tovarrian Bradford Russell
Civil Action No.: 2:23-cv-6131-RMG
Our File: 3241-14533

CONFIDENTIAL ENCLOSURES FOR *IN CAMERA* REVIEW

Dear Judge Gergel:

Pursuant to the Court's Order of June 17, 2025 (ECF No. 55), and as a follow up to my correspondence to the Court dated June 27, 2025 (ECF No. 57-4), please find enclosed for *in camera* review Lytx, Inc.'s ("Lytx") countersigned version of the previously provided master purchase agreement between Lytx and my client Roehl Transport, Inc. ("Roehl"). Additionally, Lytx has produced a second addendum, titled "Video Subscription Service Offering Addendum," which is enclosed also.

I am informed and believe that Lytx maintains that this information is confidential, proprietary, and competitively sensitive. Without waiver of any other objection to discoverability or admissibility, Roehl respectfully agrees with Lytx that these documents are confidential, proprietary, and competitively sensitive. Should the Court require that some or all of these documents be produced to the other litigants, Roehl respectfully requests a confidentiality order and the right to redact unrelated portions.

In light of the ongoing *in camera* review, it is Roehl's position that disclosure of the enclosed documents and/or the documents provided with my letter of June 27 would be improper at tomorrow's Rule 30(b)(6) deposition of Lytx.

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I am transmitting a copy of this cover letter to all counsel of record via an email thread that includes all counsel. The enclosures will follow via separate email directly to the ECF inbox, without a copy to other counsel.

Please do not hesitate to let us know if the Court requires any further steps from us to comply with the June 17, 2025 Order.

Yours truly,

SWEENEY, WINGATE & BARROW, P.A.



Mark S. Barrow

MSB/ajh

cc: Aaron J. Hayes, Esq. (via email)
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